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Federal Communications Commission; Rates for Interstate Inmate Calling Services

Comment on Proposed Rule Making by the Alabama Sheriffs Association

The Sheriffs of Alabama are charged with maintaining correctional facilities and providing inmates meaningful access to communicate with the outside world. Operating a correctional facility requires a careful balance between the needs of inmates housed in the facility with the need to maintain the safety and security of staff, inmates, and visitors to the facility.

If the FCC enacts price caps which severely reduce or eliminate the financial incentive of private telephone companies to provide inmate phone service, many correctional facilities will simply be unable to afford to provide phone services to inmates at all. The revenue from inmate phone calls pays for the additional security measures necessary to maintain institutional security. The importance of these measures is demonstrated by the huge number of criminal cases that are resolved every year when an inmate phone call is submitted into evidence. Those cases, which are resolved quickly due to the overwhelming nature of the evidence, have a tremendously beneficial impact on the entire criminal justice system, saving time and money for the police, courts, and both prosecuting and defending attorneys.

These important security measures, including the ability to monitor, record and block inmate telephone calls are provided without additional charge to correctional facilities by the telephone providers. Without these security measures, the risks to institutional security and public safety would quickly outweigh the benefits of allowing inmate telephone access.

The proposed inmate communication system ("ICS") rate reforms proposed by petitioners may well reduce long-term inmate access to telephone services in correctional facilities, because petitioners do not see the entire relationship between ICS, telephone companies, and institutional safety and security.

The Alabama Sheriffs Association strongly encourages the FCC to defer to the expertise of corrections facilities in regard to how best to address the operational aspects of a correctional facility, including how to obtain ICS and the related security measures needed to protect the facility and the public.

Respectfully,

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RDT/swh

"No Sheriff Shall Stand Alone."

"Coming together is a beginning; keeping together is progress; working together is success." - Henry Ford